

13 to retraining.

14 Q. Is that the remedy, that the employees then go
15 to some sort of retraining course or it might be just a
16 day or it might be longer, depending on what they're
17 missing?

18 A. Correct, yes. It could be as short as 30
19 minutes in terms of what we call an around the desk
20 session with the supervisor to cover something that's
21 relatively minor, it could be a four-hour session with an
22 instructor in a more formal setting, or it could be, if
23 it's part of their continuation training curriculum, it
24 could be anywhere from a day to five days, to give them
25 training on subjects or products that they had not
0150
1 previously being trained on.

2 Perhaps, again, as I went through earlier, we
3 have initial training, and then we have a series of
4 continuation training that's defined to -- essentially,
5 it's called a training track. It's designed to make these
6 folks fully functional over a period of time on all the
7 different resale products and processes.

8 Q. Now the other instance, which I think you said
9 was a minority of the time where you actually go back and
10 change the M&P, how does that work? What's the process
11 for doing that?

12 A. Generally, enhancements to the M&P come from the
13 LISC service reps and order writers, through their direct
14 supervisor, over to my first level staff responsible for
15 the M&P, and we have a form that they fill out,

16 essentially, and they forward to my staff.

17 Q. Kind of like an employee suggestion, almost?

18 A. It's a little more formal than that, but yes.

19 Q. Is there some process for rewarding employees

20 for making suggestions, which lead to increases in

21 productivity?

22 A. Not that I am aware of.

23 Q. The employees we are talking about here are the

24 service reps, correct?

25 A. And order writers.

0151

1 Q. These are bargained-for employees -- do you

2 understand that term?

3 A. The union.

4 Q. Well, they are either members of the union or

5 they may choose not to be members of the union, but they

6 get the same rate of pay because they are subject to the

7 collective bargaining agreement?

8 A. Correct, yes.

9 Q. So I am going to use the term bargained-for,

10 because that covers both who are members of the union and

11 not members of the union.

12 A. Right. We usually say represented and nonunion

13 members. That's fine, I understand what you mean.

14 Q. My point is, they don't get paid any more

15 whether they work hard -- if they handle a hundred orders

16 a day or two orders a day, correct?

17 MR. KOLTO-WININGER: Objection. Argumentative,

18 but go ahead. You can answer the question.

19 THE WITNESS: No, they don't get paid any
20 differently. They certainly are appraised differently
21 because they don't get paid any differently.

22 MR. ETTINGER: Q. Is there any process in there
23 to encourage employees to make suggestions to improve the
24 procedures in the LISC, to become more efficient?

25 A. I don't personally know of a formal process for
0152
1 doing that, but I would have to defer to Don Griffin who
2 has the LISC.

3 Q. I take it when you get suggestions for change,
4 you are receptive to those changes?

5 A. Absolutely.

6 Q. If you think they are good?

7 A. Yes.

8 Q. And just to recap, those changes come up through
9 the LISC management over to your side, and I forget the
10 official name of your group?

11 A. Business process group.

12 Q. The business process group?

13 A. Yes.

14 Q. Do they come all the way up to Don Griffin? Do
15 they go up the line and back down the line, like the
16 switching functions we talked about before?

17 A. No, no. They go directly from the LISC
18 management team into my management team. It's not
19 necessary for them to escalate it up to Don Griffin and
20 then across to me.

21 Q. Is it necessary for your management team to

22 escalate it to you in order to make a change?

23 A. No.

24 Q. Let me ask this, how -- you are constantly, as

25 stated before, studying the processes in the LISC in order
0153

1 to improve them, correct?

2 A. Yes.

3 Q. And you have a staff of how many people total?

4 I am not asking direct reports, I am asking all.

5 A. About 20 to 25. I have both permanent full-time

6 employees and contract employees as well.

7 Q. Let me ask you about --

8 - A. Can I interrupt you for a second and ask if we

9 can take just a two-minute health break?

10 MR. ETTINGER: Yeah, sure.

11 THE WITNESS: Thank you.

12 (Recess taken.)

13 MR. ETTINGER: Back on the record.

14 Q. Before the break, I think we were talking about

15 the number of people who report to you, and I think you

16 said approximately 25, both employees and contract

17 personnel?

18 A. Yes.

19 Q. Looking first at the full-time employees, are

20 they all management employees?

21 A. Yes.

22 Q. By similar token, the contract employees, at

23 least they are not covered by union contract?

24 A. Correct.

25 Q. And they are treated like management employees?
0154

1 I don't mean for pay purposes, but for supervisory
2 purposes.

3 A. Yes, although none of my first level staff has
4 subordinates, including my contract folks, but they are
5 all considered to be managers.

6 Q. Right. They're specialists, if you will?

7 A. Yes.

8 Q. Just like Mr. Kolto, if he were an employee,
9 would be considered manager, if he didn't have a
10 subordinate?

11 A. Correct.

12 Q. So you have both your contract people and your
13 employees are specialists, if you will, in writing
14 procedures?

15 A. Yes.

16 Q. In between you and your first level supervisors,
17 you have a number of second level managers, correct?

18 A. My second level managers direct report to me.

19 Q. Right.

20 A. Yes.

21 Q. Do they do anything other than supervise? Do
22 they also write procedures?

23 A. Two of my second level managers are supervising
24 managers, the other second level manager and the contract
25 project managers do not have subordinates, and they are

0155

1 considered project managers.

2 Q. And there's project managers who actually write
3 things?

4 A. No. Actually they have inter-departmental
5 teams. They do process development with these
6 inter-departmental teams, as well as issues management.
7 Implementation functions belong to them, and it's the
8 first level staff that does the actual writing of
9 procedures.

10 Q. You mentioned a number of functions in your last
11 answer, like process management. Maybe you can define
12 those terms for me.

13 A. Process management is largely the function of
14 developing business processes and managing those processes
15 after implementation, in terms of looking for
16 opportunities to improve processes. Again, issues
17 management, acting as an on-site support for the LISC and
18 their management team during implementation, those types
19 of functions.

20 Q. Do you or your group have responsibility for
21 writing processes for other organizations at Pacific,
22 other than the LISC?

23 A. No.

24 Q. Do you have a budget that you are subject to?

25 A. My district?

0156

1 Q. Yeah.

2 A. No.

3 Q. Your district does not have a budget, that you
4 know of?

5 A. No, I personally do not have a budget for my
6 district.

7 Q. Who is your direct supervisor now? Is it still
8 Ms. Spain?

9 A. No, John Stankey.

10 Q. You report directly to John Stankey?

11 A. Yes.

12 Q. To your knowledge, does Mr. Stankey have a
13 budget?

14 A. As far as I know he does, yes.

15 Q. So the costs of your organizations are included
16 in his budget?

17 A. Yes.

18 Q. But you don't know -- you don't have any costs
19 that you manage personally?

20 A. No.

21 Q. So what happens if you determine that you --
22 hypothetically, you needed to add 10 people, either as
23 employees or as contract employees, for a period of a
24 year, say, next year. How would you go about doing that?

25 Would you have to ask permission from Mr. Stankey, or do
0157

1 you have authority to just go out and do it?

2 A. I would get permission from Mr. Stankey to add
3 head count, either permanent or contract.

4 Q. And Mr. Stankey became your boss on January
5 16th, 1997, is that correct?

6 A. That sounds about right, yes.

7 Q. And prior to that time, who did you report to?

8 A. I reported to Carol Spain, who was on maternity
9 leave -- is on maternity leave.

10 Q. So in December and early January, you reported
11 to Carol Spain, who was on maternity leave?

12 A. Right.

13 Q. So if you needed something from your supervisor,
14 who would you go to?

15 A. Eileen Arbues.

16 Q. Now Ms. Arbues is still part of the industry
17 markets group, or is she not?

18 A. Yes, she is.

19 Q. So basically, at some point, you were
20 transferred from her organization to Mr. Stankey's
21 organization?

22 A. Yes.

23 Q. And that was when Mr. Stankey came in?

24 A. Yes.

25 Q. I see. Going back to the time that you reported
0158
1 up the line to Ms. Arbues, did you ever have occasion to
2 add employees, either permanent or contract?

3 A. Yes.

4 Q. And at that time, did you have a budget?

5 A. No.

6 Q. I take it then, you needed to ask permission
7 from Ms. Arbues?

8 A. Yes.

9 Q. Did you do so?

10 A. Yes.

11 Q. What was the result?

12 A. I added staff.

13 Q. Did you add as many as you asked for?

14 A. Yes.

15 Q. How many was that, do you remember?

16 A. It has varied throughout '95 and '96. I asked
17 for and got seven in '95. I asked for and got another 12
18 in second or third quarter '96.

19 Q. Does that complete your answer?

20 A. Yes.

21 Q. And since the time that you've reported to
22 Mr. Stankey, have you had occasion to ask for an increase
23 in your staff?

24 A. No.

25 Q. What process do you, as the manager of this
0159
1 group, go through in determining that you, A, that you
2 need to add people and, B, determine how many people to
3 add?

4 A. We look at the products that are coming into the
5 resale market, either as a result of contract negotiations
6 or regulatory activities. We determine how many hours
7 it's going to take the methods developer to write the M&P,
8 test it, implement it, essentially within the LISC.

9 We also look at the scope of the project, in
10 terms of whether it is a long-term project, something that

11 we are going to need to manage that's fairly, fairly
12 large, or if it's strictly a single product for which a
13 process and M&P can be developed.

14 And then we go into a maintenance mode that will
15 influence whether or not we actually need another head
16 count to accommodate it, or whether we absorb that into
17 the work group of the organization.

18 Q. Does Pacific have M&P's for writing M&P's?

19 A. Pacific offers courses for writing and,
20 essentially, a number of those courses are applicable to
21 the writing of M&P's.

22 Q. So the people who write M&P's have gone through
23 some training at Pacific?

24 A. Yes.

25 Q. Let me ask you. The contract people you have,
0160
1 are they basically former Pacific Bell employees?

2 A. Some are.

3 Q. Some of whom took early retirement or something?

4 A. Some did, yes.

5 Q. And there was a great offer in 1996 --

6 MR. KOLTO-WININGER: Objection. Vague.

7 MR. ETTINGER: Strike the question.

8 Q. Is it your belief that your staff is currently
9 large enough to handle the work that it has before it for
10 the rest of 1997, or do you anticipate needing to add
11 employees?

12 A. I am going to be adding employees, largely to

13 fill out the requests that I made in 1996. It's very --

14 it's sometimes very difficult to find qualified people to

15 fill these positions, so I am continuing to fill the

16 positions that I requested and got approval for in 1996.

17 In addition, I lost three members of my staff to early

18 retirement, so we are back filling those positions.

19 Q. So the 12 that you alluded to earlier for the

20 third quarter of '96, you didn't get them all at once?

21 You are in the process of finding them?

22 A. Correct.

23 Q. So you have vacancies right now?

24 A. Correct.

25 Q. You have 25 employees and how many vacancies?

0161

1 A. Actually, I have head count for about 30 plus

2 employees. I can't give you an exact number as to the

3 vacancies. Each of my supervising second level managers

4 has the count on what's required for each of their teams.

5 Q. And let's assume that your head count is filled

6 within a reasonably short time frame. If that were the

7 case, would you then have enough head count to

8 satisfactorily complete your tasks in 1997, as you

9 understand them now to be?

10 A. I believe so, yes.

11 Q. So then it's fair to assume that if your work

12 stays as you anticipate it to be, that you don't

13 anticipate asking for additional head count through the

14 rest of this year?

15 A. Correct.

16 Q. Have you looked beyond 1997 in head count?

17 A. To a certain extent, yes. In terms of, again,
18 as to whether I pick up contract employees to handle a
19 short-term project, or a permanent full-time head count to
20 handle something that's going to require maintenance going
21 forward, so in that sense, yes.

22 Q. Do you anticipate expanding sometime in 1998, or
23 contracting?

24 A. No, I don't anticipate expanding or contracting.

25 I anticipate that I am going to remain stable.
0162

1 Q. I take it that, in the event you have to
2 contract, that the -- first, by contract I mean getting
3 smaller, the first place where you would jettison head
4 count is contract employees?

5 A. Yes.

6 Q. That's a Pacific Bell policy?

7 A. Yes.

8 Q. In filling the head count that you have, what
9 are the skills that you look for in hiring people for your
10 group?

11 A. We look for strong written communication skills,
12 oral communication skills and probably in that order, in
13 terms of priority, because they are writers first, because
14 they are presenters. We look for subject matter
15 expertise, background in the -- in the area that we are
16 going to be asking them to perform.

17 So in other words, we would look for someone

18 with PBX background to write PBX Methods and Procedures
19 and develop PBX business processes. We look to see if
20 they have experience as a manager with Pacific Bell and
21 have experience with the development of business
22 processes. We look for experience and knowledge in the
23 use of certain software applications, both word processing
24 applications as well as business systems applications
25 internal to Pacific Bell.

0163

1 In other words, do they have experience with our
2 service order system and our Hypertext retrieval system,
3 it's called Superbook. Those kinds of basic skills for
4 inputting M&P and formulating M&P for purposes of use
5 online.

6 Q. Is telecommunications experience an absolute
7 necessary prerequisite to be hired into your group?

8 A. No.

9 Q. So you could -- would you hire somebody, for
10 example, is it possible to hire right out of college?

11 A. Yes.

12 Q. So then these people wouldn't have any
13 experience with Pacific Bell systems, would they?

14 A. That's true.

15 Q. Do you have an order of priority as to hiring or
16 adding people to your group? In other words, you first
17 look for Pacific Bell employees, second, you look for
18 employees of other telephone companies, and third, look
19 for all others or something?

20 A. That's pretty much the priority. We would look

21 internally first. We would look for lateral candidates,
22 existing first level managers, and of course, in priority
23 within that first level group, we would look for
24 previously experienced Methods and Procedures writers or
25 training people who have experience doing training or
0164
1 developing training and/or technical, developing technical
2 materials, technical writers.

3 We would then, having exhausted that, we would
4 then look for people with telecommunications background
5 and very strong written skills. We generally ask for
6 examples or samples of their writing capabilities. And
7 then we would -- and then we would look for folks that
8 have potentially telecom background but do have strong
9 written analytical skills, are proficient in the use of
10 Word and the other applications that we use for developing
11 M&P, that type of thing.

12 Q. Do all new hires to your group go through a
13 training course?

14 A. There is not one prescribed training course for
15 M&P writers. There are a series of different courses, and
16 eventually, yes, the members of my staff attend that
17 training.

18 Q. Do they also have to --

19 MR. KOLTO-WININGER: Is this an issue in the
20 case of how -- I have given you quite a bit of latitude
21 about whether this is relevant, but we have been 20
22 minutes on how we hire M&P personnel.

23 MR. ETTINGER: An issue in the case is whether

24 Pacific devoted adequate resources to --

25 MR. KOLTO-WININGER: M&P's?

0165

1 MR. ETTINGER: Well, no. To the entire planning
2 of the LISC.

3 MR. KOLTO-WININGER: Okay.

4 MR. ETTINGER: And this is one aspect of it I
5 think I am entitled to. I am just about done with this.

6 MR. KOLTO-WININGER: All right.

7 MR. ETTINGER: If you are getting bored, I will
8 move on.

9 MR. KOLTO-WININGER: Very.

10 MR. ETTINGER: Q. I am not sure if this was
11 asked, so forgive me, but were you involved, in any way,
12 in estimating the capacity of the LISC, how many orders
13 per day it can handle?

14 A. No.

15 Q. So I think I showed you an exhibit and you were
16 not involved in that?

17 A. No.

18 Q. Similarly, there are other exhibits in the case,
19 and I will go through these quickly and ask if you were
20 involved -- Exhibit 4, which is a letter from Mr. Sinn to
21 Ms. Collier at AT&T, which estimates the LISC capacity at
22 2,000 per day by the end of January 1997, and the letter
23 is dated December 4th, 1996. Were you involved, in any
24 way, in coming up with that estimate?

25 A. No.

0166

1 Q. It's your recollection you were not consulted by

2 Mr. Sinn about making that estimate?

3 A. That's my recollection.

4 Q. Exhibit 5 is a letter from Ms. Fetter to

5 Ms. Hedgpeth of AT&T, dated December 11th. It uses the

6 same 2,000 order per day LISC capacity estimate by the end

7 of January. Were you involved in making that estimate?

8 A. Not to my recollection.

9 Q. And so it's your recollection you weren't

10 consulted by Ms. Fetter about this letter?

11 A. Correct.

12 Q. And finally, Exhibit 6 is a letter from

13 Mr. Moulton to Reed Hundt, Chairman of the FCC, dated

14 December 13th, 1996, which estimates that the LISC will be

15 able to handle 4,000 orders per day by the end of January

16 1997. Do you see that in the last paragraph?

17 A. I see it.

18 Q. Were you consulted by Mr. Moulton?

19 A. No.

20 Q. I take it you were not involved in the

21 calculation of the estimate of 4,000 orders per day by the

22 end of January 1997?

23 A. No.

24 Q. Just bear with me a second. I am just checking

25 the subjects here that -- most of them have been covered

0167

1 already.

2 MR. KOLTO-WININGER: Sure.

3 MR. ETTINGER: Q. I just did want to follow up
4 on the May 31st, 1997, update to RMI, or they call it
5 update, or what's the term of art?

6 MR. KOLTO-WININGER: Release.

7 THE WITNESS: Release.

8 MR. ETTINGER: Q. Release 3.0, correct?

9 A. Yes.

10 Q. Is that the release that's going to allow for a
11 process that the industry refers to as, quote,
12 flow-through?

13 A. Yes.

14 MR. ETTINGER: All right. Thank you. That
15 completes my questioning. Thank you for your patience.
16 Even if your counsel was bored, I hope you weren't too
17 bored.

18 THE WITNESS: I found it very interesting.

19 MR. HARRIS: Would you like to continue on
20 through or do you need a quick break, or what?

21 MR. KOLTO-WININGER: How long do you think you
22 are going to be?

23 MR. HARRIS: Probably less than 20 minutes.

24 THE WITNESS: Okay. Let's continue on.

25 EXAMINATION BY MR. HARRIS
0168

1 MR. HARRIS: Q. Good afternoon, Ms. Wood. My
2 name is Glenn Harris, and I am counsel for Brooks Fiber
3 Communications. I have a few questions, mostly
4 definitional and organizational clarifications. I need
5 some help from you to understand the larger picture.

6 First of all, is it an accurate statement that
7 you were responsible for developing resale processes in
8 the LISC?

9 A. Yes.

10 Q. And that you used to be responsible for
11 developing facilities based processes?

12 A. For the LISC, yes.

13 Q. Yes. Prior to your current position, you used
14 to be responsible for facilities based processes?

15 A. Yes. Actually, I had both facilities based and
16 resale.

17 Q. But your current responsibilities do not include
18 facilities based processes; is that correct?

19 A. That's correct.

20 Q. Who is currently responsible for facilities
21 based processes?

22 A. Joyce Miller.

23 Q. Do you and Joyce both work as part of the
24 business process group?

25 A. We are in two different BP organizations. We
0169
1 are both in inventory markets group. Joyce is in the
2 Eileen Arbues organization and I am in the John Stankey
3 organization.

4 Q. So the term business process group, where does
5 that exactly fit into what you just described?

6 A. There are two of them, one for facilities based
7 and one for resale.

8 Q. With regard to the specific systems being
9 developed for facilities based and resale, is there an
10 overlap in those systems and also in processes?

11 A. Are you referring to the operational support
12 systems, the interfaces for the CLC's, or are you
13 referring to Pacific's internal systems used to provision
14 each set of products both resale and facilities based?

15 Q. I am referring, specifically, to those services
16 who provision to CLC's.

17 A. Okay. Both facilities based services and resale
18 services utilize some of the same systems. There are some
19 differences, but for the most part, the service order
20 system is the same for both facilities based and resale,
21 and many of the downstream maintenance and provisioning
22 systems are the same for both facilities and resale. The
23 interface systems between Pacific and the CLC's for
24 facilities based and resale are somewhat different.

25 Q. Can you be more specific?
0170

1 A. Okay. For facilities based products, including
2 unbundled loop, interim number portability, and local
3 interconnection, it is the Cesar system that's used by the
4 facilities based CLC's to order those services.

5 Resale, on the other hand, uses the Cleo, which
6 is a subsystem of Cesar, for the ordering of its services,
7 basic and PBX, and then uses Pacific Bell's service
8 manager for the ordering of Centrex and ISDN.

9 Q. Thank you. That does help. John Stankey, his
10 current title is resale operations vice president; is that

11 correct?

12 A. Yes.

13 Q. He has nothing to do with facilities based

14 ordering systems or processes at this time?

15 MR. KOLTO-WININGER: As far as you know.

16 THE WITNESS: As far as I know?

17 MR. HARRIS: Q. No. I understand from your

18 prior testimony today that increased mechanism -- excuse

19 me, increased mechanization is crucial to the achievement

20 of parity between Pacific Bell's retail provisioning and

21 its resale provisioning to CLEC's; is that correct?

22 A. Well, I believe what I said was that in the

23 nature of the process and the mechanization associated

24 with resale services, there are delays inherent in that

25 process that don't exist on the retail side of the

0171

1 business. So in that sense, I mean -- you know, I can't

2 make the broad statement that says that mechanization is

3 crucial to bring us into parity.

4 There are certain circumstances in which some

5 level of process change or mechanization is necessary to

6 bring us into parity, and that, specifically, I

7 referenced -- was referencing new services and new

8 services for residential customers, whether it's quick

9 dial tone or connected facility.

10 MR. HARRIS: Off the record.

11 (Discussion off the record.)

12 MR. HARRIS: Q. Now, you also stated that

13 mechanization did not occur in certain circumstances,
14 using complexity of some services that Pacific Bell was
15 required to offer pursuant to the resale decision in March
16 of 1996; is that correct?

17 A. I believe what I said was that mechanization did
18 not occur in the time frame that we had thought it would
19 occur, due to complexity of the development effort, not
20 necessarily in direct relationship to the products. But
21 essential development of the systems has -- is a much more
22 complex development cycle than we had originally
23 anticipated.

24 Q. And that is, in part, because of the complexity
25 of the services and/or features?

0172

1 A. No. I don't think that it has anything to do
2 with the service end or features. I think it has to do
3 with the complexity of the interface between Pacific and
4 the CLC's.

5 It also has to do with the lack of national
6 standards around that interface up until fourth quarter of
7 1996. There are a number of different factors that go
8 into systems development. And systems development of this
9 magnitude and the complexity of it has resulted in delays,
10 in terms of when we are getting that mechanization.

11 Q. So then, why is it that with the 5/31 release,
12 there will not be flow-through capability for ISDN and
13 Centrex services on resale?

14 A. That has largely to do with the complexity of
15 the business processes associated with those services.

16 They are much more complex business processes. It doesn't
17 have a direct relationship to the complexity of the
18 product, but the process that goes into supporting those
19 products.

20 Q. Could you be more specific about what,
21 specifically, you mean by that?

22 A. Sure. Let me take Centrex, because I am most
23 familiar with Centrex, rather than ISDN.

24 In the case of Centrex, there are ancillary
25 processes that must occur before the actual ordering
0173
1 process can commence. We have to do -- they're called
2 M-1031's. They are, essentially, a -- it's, essentially,
3 a manual process today, even in our retail business, that
4 lays out the nature of the Centrex service prior to
5 actually issuing a service order within the system,
6 because there's pre-provisioning information that the
7 service rep needs to include on that service order when
8 they enter it into the system. So -- and that's just one
9 example of some of the ancillary or peripheral functions
10 that need to occur prior to actual order issuance.

11 And with some of these products, there are --
12 there's more than one of these functions that needs to be
13 performed prior to the actual issuance of service. In
14 some cases, you have to do a certain level of loop or
15 facility reservation, or determination of facility
16 availability, before you get into the actual provisioning
17 process. You may have to ensure that you have conditioned

18 pairs available at the location for which you are ordering
19 service.

20 There are translations that need to be put into
21 the switch prior to, again, the actual issuing of service
22 orders. So there are a number of different things that
23 have to go on as a result of ensuring that the service
24 will work once it's provisioned, and they are not all
25 service order driven processes.

0174

1 Q. So to the best of your knowledge, is the time
2 between when the end user places the order, either with
3 the CLC or with Pacific Bell, on retail, is the time
4 interval between that placing the order and the actual
5 provisioning of the service the same?

6 A. Yes.

7 Q. You stated previously that you met with Greg
8 Torretta and you discussed resale processes and
9 development priorities, and also the national forums or
10 the OBF proceeding at the FCC. What, specifically, were
11 the development priorities that you decided upon with
12 Mr. Torretta?

13 A. In terms of systems development?

14 Q. Yes.

15 A. Essentially, the first priority being to
16 establish an interface by which CLC's can order basic
17 exchange resale services, which we expected and which have
18 been proven to be the highest volume of services, so that
19 was the first priority, to establish what is now the
20 resale mechanized interface or RMI, the NDM interface

21 between us and CLC's.

22 Then came the ability to send responses to those
23 requests, again through the RMI. The ability to send back
24 Firm Order Confirmations, completions, rejects, those
25 things that constitute automated responses back to the
0175
1 CLC.

2 Then, of course, there's the tracking of the
3 requests as they come into the LISC and the need for the
4 LISC to be able to get status on the requests, in terms of
5 where it resides within the LISC, who's got it, who is
6 working on it, where it is within the order issuance
7 process, the response process, and most recently, the
8 priority associated with the 5/31 flow-through effort.

9 Q. Will the 5/31 flow-through or 5/31 release
10 create parity in the provisioning intervals for all
11 services and features, which Pacific Bell offers to its
12 retail customers, as Pacific Bell offers on resale to
13 CLEC's?

14 A. Well, for the most part, we have parity today in
15 those provisioning intervals. The only area for which
16 there exists some disparity is in new connects for
17 residential services with quick dial tone and connected
18 facilities. The flow-through effort should facilitate --
19 bring us in closer parity with the retail business with
20 you. I cannot say with absolute certainty that it will
21 close the gap entirely.

22 Q. Are there services and features that will be

23 excluded from flow-through capability with the 5/31 RMI

24 release?

25 A. The 5/31 RMI release is expected to address

0176

1 migration activities for basic exchange services, so PBX

2 is not included in that effort, neither is Centrex or

3 ISDN.

4 Q. Specifically, services which have flow-through

5 capability to Pacific Bell in retail, which ones of those

6 services and features will be excluded from the

7 flow-through capability of the 5/31 release of Pacific

8 Bell's retail side?

9 A. I don't know that I would categorize the

10 mechanization on the retail side of the business as

11 flow-through, because an end-user customer does not have

12 electronic interface with Pacific Bell by which to order

13 services. So in that sense, you know, I wouldn't

14 necessarily categorize that as flow-through.

15 Q. Specifically then, the CLEC placing the order on

16 behalf of the end user, which services and features which

17 Pacific Bell enjoys flow-through capability will a CLEC

18 not have that same flow-through capability upon the 5/31

19 release?

20 MR. KOLTO-WININGER: Do you understand the

21 question?

22 THE WITNESS: I understand the question.

23 MR. KOLTO-WININGER: Could we go off the record

24 just for a second?

25 (Discussion off the record.)